

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

HASBRO, INC.,

Plaintiff,

-against-

INFOGRAMES ENTERTAINMENT, S.A. a/k/a
ATARI, S.A.,

Defendant.

C.A. No. 09 Civ. 610 (S) (LDA)

**PLAINTIFF HASBRO, INC.'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

Plaintiff Hasbro, Inc. (“Hasbro”) hereby moves pursuant to Rule 37 of the Federal Rules of Civil Procedure (“F.R.C.P.”) and District of Rhode Island Civil Local Rule 37 to compel defendants Atari, S.A., Atari Interactive, Inc., and Atari, Inc. (collectively, “Atari”) to produce documents in response to Hasbro’s First Request for the Production of Documents. Although Hasbro has attempted to meet and confer in good faith with Atari on each disputed request, the parties have reached an impasse on certain requests, forcing Hasbro to seek the Court’s intervention under F.R.C.P. Rule 37(a). *See* Declaration of James M. Pearl (“Pearl Declaration”) at ¶¶ 4-6, Exs. 3-5 (filed concurrently herewith). In support of its Motion, Hasbro relies upon the concurrently-filed Memorandum of Points and Authorities and supporting Pearl Declaration.

Dated: December 23, 2010

HASBRO, INC.
By its Attorneys,

/s/ Todd D. White
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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December 2010, the within document was served upon the following counsel of record via electronic mail and United States First Class Mail:

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